

Exhibit 9

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

Case Number 07-5944 (SC)

5 MDL No. 1917
6

- - - - - x

7 In Re: CATHODE RAY TUBE (CRT)
8 ANTITRUST LITIGATION

9 This Document Relates to
10 ALL ACTIONS

11 - - - - - x
12

13 VIDEO DEPOSITION OF STEVEN DEASON

14 Richmond, Virginia

15 Wednesday, April 23, 2014

16 SSS 10:58 a.m.
17

18 * * * * *
19
20
21
22
23
24
25

61

1 Q You said Circuit City might have known 12:48:36
2 at some point in time where a CRT within a CRT 12:48:38
3 finished product had been manufactured. Is that 12:48:41
4 something that anyone with the company would still 12:48:43
5 know? 12:48:46

6 MR. LAHAD: Are you talking about the 12:48:46
7 Trust? 12:48:48

8 MS. LIN: Yes. 12:48:48

9 THE WITNESS: Again, it would have to be 12:48:49
10 a one on one type of experience where a buyer 12:48:55
11 who went over to see LG and Samsung which we 12:48:58
12 did a couple of times a year go over and see 12:49:05
13 the product, if they happened to see a 12:49:08
14 manufacturing facility, then they would do 12:49:12
15 it, but it wouldn't have been, again, there 12:49:14
16 was no need for us to know where the product, 12:49:19
17 where the CRT was manufactured. 12:49:23

18 BY MS. LIN: 12:49:25

19 Q Was the identity of the entity making 12:49:28
20 the CRT ever considered by Circuit City as part of 12:49:32
21 the finished product purchasing decisions? 12:49:36

22 A I wouldn't think so. 12:49:39

23 Q Do you know for the CRT finished 12:49:40
24 products that Circuit City purchased what 12:49:48
25 percentage of the purchase price was attributable 12:49:50

1 to the cost of that CRT? 12:49:54

2 A No. 12:49:55

3 Q Would there be a way for Circuit City to 12:49:56

4 determine that information? 12:49:59

5 A No. 12:50:00

6 MR. GRALEWSKI: Objection, form. 12:50:02

7 BY MS. LIN: 12:50:03

8 Q You testified before lunch that 12:50:09

9 typically in a cost negotiation with a vendor 12:50:11

10 regarding a CRT finished product that typically a 12:50:16

11 vendor would be the first to throw out a cost 12:50:18

12 term, do you recall that testimony? 12:50:22

13 A Yes. 12:50:23

14 Q Was Circuit City typically able to 12:50:24

15 negotiate more favorable cost terms than those 12:50:26

16 starting cost terms provided by a CRT finished 12:50:29

17 product vendor? 12:50:31

18 MR. LAHAD: Vague. 12:50:34

19 MR. GRALEWSKI: Objection, form. 12:50:36

20 THE WITNESS: Reask the question, 12:50:38

21 please. 12:50:42

22 BY MS. LIN: 12:50:49

23 Q Was Circuit City ever able to negotiate 12:50:49

24 more favorable cost terms than the starting cost 12:50:52

25 terms provided by a CRT finished product vendor? 12:50:55